

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF FLORIDA  
PANAMA CITY DIVISION**

**RAMON ARMAS BORROTO, JR.,**

Plaintiff,

-vs-

**CASE NO. 5:04-CV-165-RH.WCS**

**L. MCDONALD, PATE, MCKENZIE  
and KENT,**

Defendants.

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**DEFENDANTS' WITNESS AND EXHIBIT LIST**

Defendants, McDonald, Pate, McKenzie, and Kent, hereby submit their list of trial witnesses and exhibits as follows:<sup>1</sup>

**A.**

**TRIAL WITNESSES**

1. Larry McDonald (Defendant)
2. Channing McKenzie (Defendant)
3. Harold Pate (Defendant)
4. Donna Kent (Defendant)
5. Cleo Anderson
6. Travis Butts
7. J. Conger
8. Timothy Scott

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<sup>1</sup> Defendants are contemporaneously herewith moving for leave to file this witness and exhibit list out of time.

9. Tim Yaw
10. J. Coker
11. Records Custodian, Office of the Inspector General, Department of Corrections
12. Records Custodian, inmate records, Department of Corrections
13. Medical records Custodian, Florida State Prison

**B.**

**TRIAL EXHIBITS**

- \* All exhibits listed herein are official records of the Department of Corrections
1. Bureau of State Investigations, Case Summary Case No. 02-13942, incident date November 29, 2002
  2. Office of Inspector General Investigation No. 02-13942, dated March 5, 2003, by Tim Yaw pertaining to Ramon Borroto, date of incident November 28, 2002, and attachments thereto
  3. Corrective Action/Disposition Report, dated March 26, 2003, pertaining to Case No. 02-13942
  4. Incident Report #02061-192, pertaining to Washington Correctional Institution; Ramon Borroto, date of incident November 29, 2002, reporting employee Tim Scott
  5. Incident Report #02012-109, pertaining to Washington Correctional Institution, Ramon Borroto, date of incident December 16, 2002, reporting employee Jimmy Coker
  6. Inspection of Special Housing Records, pertaining to Washington Correctional Institution, G-dorm
  7. Daily Records of Segregation, Close Management, and supplementals, pertaining to Ramon Borroto, Washington Correctional Institution
  8. Chronological Record of Health Care, pertaining to Ramon Borroto, dated November 28, 2002
  9. Emergency Room record, pertaining to Ramon Borroto, dated November 29, 2002

10. Diagram of injury, pertaining to Ramon Borroto

Respectfully submitted,

BILL McCOLLUM  
ATTORNEY GENERAL

/s/ Joe Belitzky

JOE BELITZKY  
Senior Assistant Attorney General  
Florida Bar No. 0217301

/s/ Shelly L. Marks

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U.S. Mail to Ramon Borroto, Jr., #X27467, Florida State Prison, 7819 N.W. 228<sup>th</sup> Street, Raiford, Florida 32026-1000, on this 16 day of April 2007.

/s/ Joe Belitzky

Attorney